

# **EXHIBIT A**

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Christopher K.L. Young (State Bar No. 318371)  
Travis Manfredi (State Bar No. 281779)  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF TA-NEHISI COATES'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**

1 and any other applicable rules or laws. Plaintiff will interpret these instructions as not  
2 requiring Plaintiff to perform unreasonable searches, not requiring cumulative or  
3 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in  
4 the applicable rules and laws.

5 14. In providing these responses and objections and in producing documents, Plaintiff does  
6 not waive any ground on which he may object to the use of any response, objection or document in  
7 subsequent proceedings.

8 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to  
9 supplement these responses.

### 10 **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### 11 **REQUEST FOR PRODUCTION NO. 1:**

12 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED  
13 WORKS.

#### 14 **RESPONSE TO REQUEST NO. 1:**

15 In addition to and without waiving the general objections set forth above, Plaintiff objects to  
16 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this  
17 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further  
18 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,  
19 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff  
20 objects to this Request on the grounds that such documents are publicly accessible, are equally  
21 available to Defendants, or are already in their possession, custody, or control.

22 Subject to and without waiving the general and specific objections stated above, Plaintiff will  
23 search for and produce relevant and responsive non-privileged copyright registrations within his  
24 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### 25 **REQUEST FOR PRODUCTION NO. 2:**

26 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third  
27 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,  
28 statements to the press, and discussions with other authors not a party to the ACTION.

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JUNOT DÍAZ'S RESPONSES  
AND OBJECTIONS TO DEFENDANT  
META PLATFORMS, INC.'S FIRST SET  
OF REQUESTS FOR PRODUCTION OF  
DOCUMENTS AND THINGS**

and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which he may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within his possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

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Christopher K. L. Young (State Bar No. 318371)  
Louis A. Kessler (State Bar No. 243703)  
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Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**

those set forth in the Federal Rules of Civil Procedure, the Local Rules of this Court, and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which he may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendant, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within his possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF ANDREW SEAN GREER'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**



and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which he may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within his possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

Joseph R. Saveri (State Bar No. 130064)  
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Travis Manfredi (State Bar No. 281779)  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF DAVID HENRY HWANG'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**

and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which he may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within his possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

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Christopher K. L. Young (State Bar No. 318371)  
Louis A. Kessler (State Bar No. 243703)  
Holden Benon (State Bar No. 325847)  
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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**

1 duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the  
2 applicable rules and laws.

3 14. In providing these responses and objections and in producing documents, Plaintiff does not  
4 waive any ground on which he may object to the use of any response, objection or document in  
5 subsequent proceedings.

6 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to  
7 supplement these responses.

8 **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

9 **REQUEST FOR PRODUCTION NO. 1:**

10 Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED  
11 WORKS.

12 **RESPONSE TO REQUEST NO. 1:**

13 In addition to and without waiving the general objections set forth above, Plaintiff objects to this  
14 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this  
15 Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further  
16 objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,  
17 work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff  
18 objects to this Request on the grounds that such documents are publicly accessible, are equally available  
19 to Defendant, or are already in their possession, custody, or control.

20 Subject to and without waiving the general and specific objections stated above, Plaintiff will  
21 search for and produce relevant and responsive non-privileged copyright registrations within his  
22 possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

23 **REQUEST FOR PRODUCTION NO. 2:**

24 All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third  
25 parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews,  
26 statements to the press, and discussions with other authors not a party to the ACTION.  
27  
28

Joseph R. Saveri (State Bar No. 130064)  
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Christopher K.L. Young (State Bar No. 318371)  
Travis Manfredi (State Bar No. 281779)  
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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF MATTHEW KLAM'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF MATTHEW KLAM'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which he may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within his possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

#### **RESPONSE TO REQUEST NO. 2:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "authors" is vague and ambiguous. Plaintiff objects to this Request



Joseph R. Saveri (State Bar No. 130064)  
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Christopher K.L. Young (State Bar No. 318371)  
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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF LAURA LIPPMAN'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**



and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which she may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within her possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K. L. Young (State Bar No. 318371)  
Louis A. Kessler (State Bar No. 243703)  
Holden Benon (State Bar No. 325847)  
Kathleen J. McMahon (State Bar No. 340007)  
Aaron Cera (State Bar No. 351163)  
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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**

those set forth in the Federal Rules of Civil Procedure, the Local Rules of this Court, and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which she may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendant, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within her possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

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Travis Manfredi (State Bar No. 281779)  
Holden Benon (State Bar No. 325847)  
Kathleen J. McMahon (State Bar No. 340007)  
Aaron Cera (State Bar No. 351163)

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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF RACHEL LOUISE SNYDER'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND  
THINGS**

and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

14. In providing these responses and objections and in producing documents, Plaintiff does not waive any ground on which she may object to the use of any response, objection or document in subsequent proceedings.

15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the right to supplement these responses.

### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.

#### **RESPONSE TO REQUEST NO. 1:**

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff further objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged copyright registrations within her possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

#### **REQUEST FOR PRODUCTION NO. 2:**

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

David A. Straite (admitted *pro hac vice*)

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*dstraite@dicellolevitt.com*

*Counsel for Plaintiffs and the Proposed  
Class, Additional Counsel Listed Below*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,  
CHRISTOPHER GOLDEN, TA-NEHISI  
COATES, JUNOT DÍAZ, ANDREW SEAN  
GREER, DAVID HENRY HWANG,  
MATTHEW KLAM, LAURA LIPPMAN,  
RACHEL LOUISE SNYDER, JACQUELINE  
WOODSON, AND LYSA TERKEURST,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.;

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S FIRST SET OF REQUESTS FOR  
PRODUCTION**

**PROPOUNDING PARTY: Defendant Meta Platforms, Inc.**

**RESPONDING PARTY: Lysa TerKeurst**

**SET NUMBER: One (1)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Lysa TerKeurst ("Plaintiff") in the above-titled action hereby responds to Defendant Meta Platforms, Inc. ("Defendant" or "Meta") First Set of Requests for Production of Documents (the "Requests"). An agreement by Plaintiff to search for documents does not mean that she has documents in her possession, custody, or control.

1 requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed  
2 the obligations set forth in the applicable rules and laws.

3 14. In providing these responses and objections and in producing documents, Plaintiff  
4 does not waive any ground on which she may object to the use of any response, objection or  
5 document in subsequent proceedings.

6 15. Plaintiff's investigation in this Action is ongoing. Plaintiff therefore reserves the  
7 right to supplement these responses.

8 **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

9 **REQUEST FOR PRODUCTION NO. 1:**

10 Complete copies of copyright registrations and deposit material for each of YOUR  
11 ASSERTED WORKS.

12 **RESPONSE TO REQUEST NO. 1:**

13 In addition to and without waiving the general objections set forth above, Plaintiff objects  
14 to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects  
15 to this Request to the extent that the term "deposit material" is undefined and ambiguous. Plaintiff  
16 further objects to this Request to the extent that it calls for documents subject to the attorney-client  
17 privilege, work product doctrine, and/or any other applicable privilege or protection from  
18 disclosure. Plaintiff objects to this Request on the grounds that such documents are publicly  
19 accessible, are equally available to Defendants, or are already in their possession, custody, or  
20 control.

21 Subject to and without waiving the general and specific objections stated above, Plaintiff  
22 will search for and produce relevant and responsive non-privileged copyright registrations within  
23 her possession, custody, or control relating to Plaintiff's ASSERTED WORKS.

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Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JACQUELINE WOODSON'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS, INC.'S  
FIRST SET OF REQUESTS FOR  
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and any other applicable rules or laws. Plaintiff will interpret these instructions as not requiring Plaintiff to perform unreasonable searches, not requiring cumulative or duplicative discovery, and not requiring Plaintiff to exceed the obligations set forth in the applicable rules and laws.

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### **OBJECTIONS AND RESPONSES TO INDIVIDUAL REQUESTS**

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#### **RESPONSE TO REQUEST NO. 1:**

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#### **REQUEST FOR PRODUCTION NO. 2:**

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